

November 23, 2012  
Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: Structure & Practices of the Video Relay Service Program. CG Docket No.10-51

Dear Ms. Dortch.

I am writing with concerns regarding CG Docket No.10-51 Structure & Practices of the Video Relay Service (VRS) Program.

I am a certified ASL interpreter who has been working in this field for nearly 30 years. I have worked as a video relay interpreter for 4 different companies that provide video relay services funded by the FCC. I do not currently work for any of them.

First, I want to say that I am glad that the FCC is looking harder at how these companies are doing business, because this has definitely become big corporate business. Among other things, I do not understand why the government should be funding guaranteed return on investment of more than 10%, especially in this current economy. However, should the reimbursement rates decrease while the companies have such obligations, there need to be provisions in place to make sure that the quality of the interpreter work force, and therefore the functional equivalency of the program, is not sacrificed to the bottom line.

To that end, I submit these three recommendations.

### **Rate Differential for Using Certified Interpreters**

One option I would urge the Commission to consider is creating a rate differential for providers when they use nationally certified interpreters. This differential could be rolled into the proposed monthly rate paid, per active user, based on the percentage of nationally certified interpreters who provide services during each given month. If considered on a per minute basis, an increased per minute rate, based on the percentage of nationally certified interpreters working that month could be implemented

This increased rate would need to be significant as the difference in pay rates between certified and uncertified interpreters can be substantial, in some locations as much as \$20/hour or more. This differential would serve to protect the functional equivalency of VRS by giving incentive to provider companies to continue to use trained, nationally certified interpreters as they consider taking measures to reduce costs. It also allows "new-to-VRS" users to consider quality of service when choosing a Default Provider.

## **Transparency in Reporting Interpreter Compensation & Benefits**

The FCC stated in the recent FNPRM concerns about lack of clarity related to the actual costs necessary to employ qualified sign language interpreters in the VRS system. I would therefore encourage the Commission to require providers to file reports outlining the specific, direct costs of interpreter wages and benefits.

Quality interpreters are what make VRS functionally equivalent -- if interpreters aren't qualified to do the work, communication doesn't happen. (Given that, perhaps the FCC should reimburse only providers where a minimum of 85% of interpreted minutes are interpreted by CA's who are nationally certified interpreters, which would make the above differential unnecessary.)

Either way, requiring itemization of interpreter employment costs would help provide a clearer picture to the FCC of the actual cost of providing the relay service, separate from other costs like outreach, research & development, equipment, software, etc.

## **Repeal the Ban on Working from Home**

I strongly urge the FCC to repeal the prohibition on interpreters working from home. Certified, professional interpreters are quite capable of maintaining confidentiality, whether at a call center, or in a home office setting. Allowing interpreters to work from home will help a great deal with cost containment - - reducing brick and mortar expenses and onsite supervision costs. Interpreters' productivity can be monitored remotely. As in every other aspect of our work, interpreters can be trusted to maintain confidentiality, in keeping with our Code of Professional Conduct. Allowing interpreters to work from home will also grow VRS by expanding the pool of available, qualified interpreters, to do the work.

I applaud the FCC for working to provide functional equivalency in telecommunication for America's Deaf, Hard of Hearing, and DeafBlind citizens. As the Commission works to revamp this program, please keep in mind how important maintaining a high-quality, credentialed interpreter workforce is to the VRS experience. Setting a rate differential for using such interpreters, requiring clear reporting regarding the actual costs of employing those interpreters, and allowing interpreters to work from home are all steps that will make the VRS program more viable, cost-efficient, and effective for years to come.

Thank you for your consideration.

Sincerely,

Catherine Mosher